

P. O. BOX 2128 • 7110 HWY. 287 EAST TELEPHONE 940-886-2217 FAX 940-886-2025 VERNON, TEXAS 76385-2128

#### **REDACTED - FOR PUBLIC INSPECTION**

#### **VIA ECFS**

June 28, 2016

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12<sup>th</sup> Street, S.W. Washington, D.C. 20554

# RE: REQUEST FOR CONFIDENTIAL TREATMENT WC Docket No. 14-58 - ETC Annual Reports and Certifications

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan Progress Report included in FCC Form 481

Confidential Information - Subject to Protective Order Before the Federal Communications Commission

#### Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Santa Rosa Telephone Cooperative, Inc. (the Cooperative), Study Area Code 442141 is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket No. 14-58. The version of the Cooperative's FCC Form 481 submitted via ECFS is a redacted version of the filing that contains no confidential information.

The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan progress report and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan progress

report is being made pursuant to Section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. These attachments contain competitively sensitive data that Santa Rosa Telephone Cooperative, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.

#### Five-Year Service Quality Improvement Plan Progress Report

Pursuant to Section 0.459 of the Commission's rules and Exemption 4 of FOIA, Santa Rosa Telephone Cooperative, Inc. requests that the text and data extracted from its five-year service quality improvement plan progress report be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative maintains as confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with Section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan Progress Report. Specifically, confidential treatment is sought for all information in the five-year plan progress report related to the Cooperative's access line counts, existing broadband capabilities, and current and planned financial investments in its network that will improve service quality, service coverage, and/or service capacity for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket No. 14-58 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a progress report on its five-year service quality improvement plan, pursuant to 47 C.F.R. §54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan progress report contains granular information on the Cooperative's access line counts and/or existing broadband capabilities as well as recent and planned capital investments in its network to improve service quality, service coverage, and/or service capacity. It also contains a map of the Cooperative's service area detailing progress toward meeting broadband deployment targets at the wire center level. This is closely guarded, privileged information that the Cooperative does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider, such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan progress report would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its recent and planned network investments that improve service quality, coverage, and/or capacity for subscribers. This would give competitors valuable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan progress report as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan progress report is not available to the public, and third-party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. The information in the five-year plan progress report details the Cooperative's most recent network upgrades in relation to its previously submitted service quality improvement plan. It may also contain upcoming planned network improvements during the five-year period ending 2019. This information would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

#### **Financial Annual Report**

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the company's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Santa Rosa Telephone Cooperative, Inc. seeks confidential treatment of its financial annual report pursuant to the March 22, 2016 *Protective Order* in WC Docket Nos. 10-90 and 14-58. The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

Santa Rosa Telephone Cooperative, Inc.] is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan progress report confidential submission bears the legend, "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE."

<sup>&</sup>lt;sup>1</sup> Connect America Fund, ETC Annual Reports and Certifications, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 (rel. Mar. 22, 2016).

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as attachments to the FCC Form 481.

In the filing submitted via ECFS, all pages containing confidential information bear the legend "REDACTED - FOR PUBLIC INSPECTION."

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Janon The

Jason Tole, Assistant GM/CFO Authorized Representative for

Santa Rosa Telephone Cooperative, Inc.

**Enclosures** 

Mr. Charles Tyler, FCC Telecommunications Access Policy Division cc:

Ms. Naomie Hudgins, Public Utility Commission

FCC For	m 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442141	
<015>	Study Area Name	SANTA ROSA TEL COOP	
<020>	Program Year	2017	
<030>	Contact Name: Person USAC should contact with questions about this data	Jason Tole	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9408862217 ext.	
<039>	Contact Email Address Email of the person identified in data line <030>	jamon, tolewarcaccess.net	
	Form Type	54.313 and 54.422	

FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819  July 2013	SANTA ROSA THE COOP   SANTA ROSA THE COOP   2017	ation from the FCC?  (yes / no ) O O  (have an existing §54.202(a) "5  (yes / no ) O O	any's existing § 54.202(a) "5 year our provision of voice telephony  442141TX11.BC112 . pdf  to 47 C.F.R. § 54.313(a)[1]. If your company is a rour progress report is only e.e.	low (Yes, No, Not Applicable) to confirm  contains a progress report on its five-year  to §54.202(a). The information shall be block as appropriate.  block as appropriate.  block as appropriate.  block as appropriate.  yes  yes  yerage and how support was used to improve service capacity  packly and how support was used to improve service capacity  yes  yerage and how support was used to improve service capacity  yes  Not Applicable
(100) Service Quality Improvement Reporting Data Collection Form	<ul> <li>&lt;0.10&gt; Study Area Code</li> <li>&lt;0.15&gt; Study Area Name</li> <li>&lt;0.20&gt; Program Year</li> <li>&lt;0.30&gt; Contact Name - Person USAC should contact regarding this data</li> <li></li></ul>	<110> Has your company received its ETC certification from the FCC? If your answer to Line <110> is yes, do you have an existing §54,202(a) "5 <111> year plan" filed with the FCC?	If your answer to Line <111> is yes, please file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.  <112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.	Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.  <113> Maps detailing progress towards meeting plan targets  <114> Report how much universal service (USF) support was received  How much (USF) was used to improve service ouality and how support was used to improve service coverage  <115> How much (USF) was used to improve service coverage and how support was used to improve service capacity  How much (USF) was used to improve service capacity and how support was used to improve service capacity  rule prior calendar year.

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<015> Study	Study Area Name	ų.				SANTA ROSA 1	TEL COOP					
- 1	Program Year					2017						:
<030> Conta	ct Name -	Person USAC	should contac	Contact Name - Person USAC should contact regarding this data	data	Jason Tole						
<035> Conta	ct Telepho	ne Number -	Number of pe	Contact Telephone Number - Number of person identified in data	in data line <030>	30> 9408862217 ext	ext					
<039> Conta	ct Email A	ddress - Emai	Address of pu	Contact Email Address - Email Address of person Identified in data line <030>	in data line <€	П	jason.tolesarcaccess.net		:			
<210> For th	he prior c	əlendar yea	r, were there	For the prior calendar year, were there any reportable voice service outages?	ole voice serv	rice outages?	Мо					
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(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<uiu> Study Area Code</uiu>	442141
<015> Study Area Name	SANTA ROSA TEL COOP
<020> Program Year	2017
<030> Contact Name - Person USAC should contact regarding this data	Jason Tole
<035> Contact Telephone Number - Number of person identified In data line <030>	9408862217 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	jason.tolessrcaccess.net
<300> Unfulfilled service request (voice)	0
<310> Detail on attempts (voice)	
	Name of Attached Document
<320> Unfulfilled service request (broadband)	0
<330> Detail on attempts (broadband)	
	Name of Attached Document

Page 4

(400) Number of Complaints per 1,000 customers	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/DMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	
<015>	Study Area Name SAIL FOR THE GIRL	
<020>	Program Year	
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line	
<039>	Contact Email Address - Email Address of person identified in data line particular to the particular and the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address - Email Address of person identified in data line particular to the contact Email Address -	
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior Offered only fixed voice calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<410>	Complaints per 1000 customers for fixed voice 0.0	
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	d
<440>	Complaints per 1000 customers for fixed broadband 0.0	
<450>	Complaints per 1000 customers for mobile broadband	

(600) Functionality in Emergency Situations Data Collection Form		FCC Form 48)  OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	442141	
<015> Study Area Name	FANTA ROMA TEL DOOR	
<020> Program Year	2017	
<030> Contact Name - Person USAC should contact regarding this data	James Tribe	
<035> Contact Telephone Number - Number of person identified in data line <030>	9400062257 v.tl	
<039> Contact Email Address - Email Address of person identified in data line <030>	james telebiroscress set	
<600> Certify compliance regarding ability to function in emergency situations	Yes	
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<ul> <li>&lt;010&gt;     <li>Study Area Code     <li>&lt;015&gt;     <li>Study Area Name &lt;020&gt;     <li>Program Year &lt;030&gt;     <li>Contact Name - Person USAC should contact regarding this data &lt;035&gt; Contact Telephone Number - Number of person identified in data line &lt;030&gt; &lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt; &lt;030&gt; &lt;031&gt; &lt;032 &lt;001act Telephone Number - Number of person identified in data line &lt;030&gt; &lt;030 &lt;031&gt; &lt;034 &lt;041&gt; &lt;041&gt; &lt;041&gt; &lt;041 &lt;041&gt; &lt;042 &lt;041 &lt;042 &lt;041 &lt;041 &lt;042 &lt;041 &lt;041 &lt;042 &lt;041 &lt;042 &lt;041 &lt;041 &lt;042 &lt;041 &lt;042 &lt;041 &lt;042 &lt;042 &lt;043 &lt;044 &lt;044 &lt;044 &lt;045 &lt;045 &lt;046 &lt;046 &lt;047 &lt;046 &lt;047 &lt;048 &lt;048 &lt;049 &lt;049 &lt;040 <p< th=""><th></th><th></th><th></th><th></th><th></th><th>OMB Control N</th><th>1 481 rol No. 3060-0986</th><th>OMB Control No. 3060-0986/OMB Control No. 3060-0819</th></p<></li></li></li></li></li></li></ul>						OMB Control N	1 481 rol No. 3060-0986	OMB Control No. 3060-0986/OMB Control No. 3060-0819
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<035>	should contact regarding th	is data	Jason Tole					
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Scare	<245	<461>	<24>	9	49	<42>	\$	<90>
	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed {Mbps}	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
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			worksheet					

rg Companies  PCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0886/OMB Control No. 3060-0819	191214			- Person USAC should contact regarding this data	ta line <030>	Contact Email Address of person identified in data line <0.30> jason, tolessrcaccess net	Santa Rosa Telaphone Cooperative, Inc.			<a>&gt; <a>&gt;</a></a>	Affiliates As Company or Brand Designation		See attached worksheet										
(800) Operating Companies Data Collection Form	<010> Study Area Code	1 :	<020> Program Year		<035> Contact Telephone Nu		<810> Reporting Carrier	<811> Holding Company	<812>	<813>													

in face!	(900) Tribal Lands Reporting	FCC Form 48.1
Data Col	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0619
		2013 Any
<010>	Study Area Code	442161
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<020>	Program Year	2017
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<035>	- 1	940862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	jason:tolešszcaccess.net
<006>	Does the filing entity offer tribal land services? (Y/N)	28.0
<910>	Tribal Land(s) on which ETC Serves	
<920>	Tribal Government Engagement Obligation	
		Name of Attached Document
ff your c to confin demons § 54.313 (921> (922> (923> (923> (925> (925> (925> (926>	If your company serves Tribal lands, please select {Yes,No, NA} for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to \$54.313(a){9} includes:  -921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.  -922> Feasibility and sustainability planning;  -924> Marketing services in a culturally sensitive manner;  -924> Compliance with Rights of way processes  -925> Compliance with Facilities Siting rules  -926> Compliance with Environmental Review processes  -927> Compliance with Cultural Preservation review processes  -928> Compliance with Tribal Business and Licensing requirements,	Select Yes or No or Not Applicable

		Fage 12
(1000) V Data Col	(1000) Voice and Broadband Service Rate Comparability Data Collection Form	FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013
<010>	Study Area Code	642341
<015>	1	SANTA ROSA TEL COOP
\$050 \$050	ı	2017
<030	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>		
<039>		jason.toletsrcaccess.net
<1000>	Voice services rate comparability certification	Yes
<1010>	Attach detailed description for voice services rate comparability compliance	442141TXILBC1010.pdf
		Name of Attached Document
<1020>	Broadband comparability certification	Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	442141TXILBC1030.pdf
	ľ	Name of Attached Document

(1200) To Lifeline Data Col	(1200) Terms and Condition for Lifeline Customers Lifeline Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819
		Total Line
<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	[Second re]
<032>	1	
<039>	Contact Email Address - Email Address of person identified in data line <030>	<030> jason tolegertatgess net
		442141TXILEC1210.pdf
<1210>	<1210> Terms & Conditions of Voice Telenhow Lifeline Dlans	
	The state of the s	
		Name of Attached Document
<1220>	· Link to Public Website	HTTP https://srcaccess.net
"Please	"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed on line 1200 contains the securited information pursuants	0,
\$ 54.42		
dundali	annually report:	
<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	
<1222>	<ul> <li>Details on the number of minutes provided as part of the plan,</li> </ul>	
<1223>	<1223> Additional charges for toll calls, and rates for each such plan.	

(2000) Pi	(2000) Price Cap Carrier Additional Documentation	FCC Form 483
Data Cof	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including	Including Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers	July 2013
<010>	<010> Study Area Code	442241
<015>	<015> Study Area Name	SANTA ROSA TEL COOP
<020>	c020> Program Year	2017
<030>	:030> Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	<035> Contact Telephone Number - Number of person identified in data line <030> 9408862217 ext.	340862217 ext.
<039>	<039> Contact Email Address - Email Address of person identified in data line <030>	line <030> jason, tolefarcacces net
- September		

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

						Name of Attached Document Listing Required Information	Name of Attached Document Listing Required Information	
Incremental Connect America Phase I reporting	2nd Year Certification 47 CFR § 54.313(b)(1)(i) - Note that for the July 1 2016 certification, this applies to Round 2 recipients of Incremental	Support  3rd Year Certification 47 CFR § 54.313(b)(1)(ii) - Note that for the July 1 2016 certification, this applies to Round 1 recipients of Incremental Support	Recipient certifies, representing year two after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbos/1Mbos - 54.313(b)(2)(i) Round 2 recipients color	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating these funding these includes in the previous accompanied by a list of census	S4.313(b)(2)(ii). Round 2 recipients only. Round 2 Recipient of Incremental Support?	Attach list of census blocks indicating where funding was spent in year two - 54.313(b)(2)(ii). Round 2 recipients only. Round 1 or Round 2 Recipient of Incremental Support?	Attach geocoded Information for Phase I milestone reports (Round 1 for year three and Round 2 for year two) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-	2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)
	<2010>	<2011>	<2022>	<2023>	<2024A>	<2024B>	<20258>	<2015>

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		Name of Attached Document Listing Required Information	Name of Attached Document Listing Required Information				
2000) Price Cap Carrier Additional Documentation (Continued) sata Collection Form ncluding Rate-of-Return Corriers offiliated with Price Cap Local Exchange Corriers	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)} 116> Certification support used to build broadband Connect America Phase II Reporting {47 CFR § 54.313(e)} 2017A> Connect America Fund Phase II recipient?	<ul> <li>Attach information for Phase II - 54.313(e)(1) - list of geocoded locations already meeting the 54.309 public interest obligations at the end of calendar year 2015 and total amount of Phase II support, if any, the price</li> </ul>	cap carrier used for capital expenditures in 2015. Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(i)	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)[2](v)	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 40% of its supported locations in the state on December 31, 2017 - 54.313(e)(3)	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in §54.309 to 60% of its supported locations in the state on December 31, 2018 - \$4,313(a)(4)	Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in \$54.309 to 80% of its supported locations in the state on December 31, 2019 - 54.313(e)(5) Recipient certifies that it offered broadband meeting the requisite public interest obligations specified in \$54.309 to 100% of its supported locations in the state on December 31, 2020 - 54.313(e)(6)
2000) Price Cap Carri Sata Collection Form Including Rate-of-Retu	Price (<2016> Connect <2017A>	<2017B>	<2018>	<2019>	<2020>	<2021>	<2026>

	L			Paq
(3005) Rate Data Collect	Of Return Carrier Additional Documentation ion Form			FCC Form 483 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code		442141	
<015>	Study Area Name		SANTA ROSA TEL	COOP
<020>	Program Year		2017	
<030>	Contact Name - Person USAC should contact regarding this	data	Jason Tole	
<035>	Contact Telephone Number - Number of person identified in	n data line <030>	9408862217 ext.	
<039>	Contact Email Address - Email Address of person identified	In data line <030>	jason.tole@srca	ccess.net
omplian	the mens delow to have compliance with five year the with the financial reporting requirements set fort ments attached below is accurate.	th in 47 CFR § 54.	an (pursuant to 47 CFR 9 54 313(f)(2). I further certify tha	202(a)) and, for privately held carriers, ensuring it the information reported on this form and in
complian	e with the financial reporting requirements set fort	th in 47 CFR § 54.	an (pursuant to 47 CFR 9 54 313(f)(2). I further certify tha	202(a)} and, for privately held carriers, ensuring it the information reported on this form and in
omplian	e with the financial reporting requirements set fort	th in 47 CFR § 54.	an (pursuant to 47 CFR 9 54 313(f)(2}. I further certify tha	202(a)) and, for privately held carriers, ensuring It the information reported on this form and in
omplian he docur	e with the financial reporting requirements set fort nents attached below is accurate.	th in 47 CFR § 54.	an (pursuant to 47 CFR 9 54 313(f)(2). I further certify tha	202(a)} and, for privately held carriers, ensuring it the information reported on this form and in
ompliand he docur	te with the financial reporting requirements set fort ments attached below is accurate.  Progress Report on 5 Year Plan  Carrier certifies to 54.313(f)(1)(iii)	th in 47 CFR § 54.	an (pursuant to 47 CFR 9 54 .313(f)(2). I further certify tha Yes - Attach Certific	t the information reported on this form and in
ompliand he docur	ce with the financial reporting requirements set fort nents attached below is accurate.  Progress Report on 5 Year Plan	th in 47 CFR § 54.	.313(f)(2). I further certify tha Yes - Attach Cextific	t the information reported on this form and in
ompliand he docur 3009) 3010A)	te with the financial reporting requirements set fort ments attached below is accurate.  Progress Report on 5 Year Plan  Carrier certifies to 54.313(f)(1)(iii)	th in 47 CFR § 54.	.313(f)(2). I further certify tha	t the information reported on this form and in
ompliant he docur 3009) 3010A) 3010B}	te with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(ii)  Milestone Certification (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment Community Anchor Institutions (47 CFR §	th in 47 CFR § 54.  Name of Attact Information	.313(f)(2). I further certify tha Yes - Attach Cextific	t the information reported on this form and in
ompliani he docur 3009) 3010A) 3010B) 3012A)	te with the financial reporting requirements set fort nents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(ii)  Milestone Certification (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment	Name of Attact Information Not Applicable Name of Attact	.313(f)(2). I further certify tha Yes - Attach Cextific ted Document Listing Required	t the information reported on this form and in
ompliani he docur 3009) 3010A) 3010B) 3012A)	te with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)  Milestone Certification (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Is your company a Privately Held ROR Carrier (47 CFR	Name of Attact Information Not Applicable Name of Attact Information	313(f)(2). I further certify that Yes - Attach Certific ned Document Listing Required - No Attachment Required ned Document Listing Required	t the information reported on this form and in
ompliani he docur 3009) 3010A) 3010B) 3012A) 3012B)	te with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)  Milestone Certification (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment	Name of Attact Information Not Applicable Name of Attact Information	313(f)(2). I further certify that Yes - Attach Certific Hed Document Listing Required - No Attachment Required Hed Document Listing Required	t the information reported on this form and in
ompliani he docur 3009) 3010A) 3010B) 3012A) 3012B) 3013)	the with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(ii))  Milestone Certification (47 CFR § 54.313(f)(1)(i))  Please Provide Attachment  Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	Name of Attact Information Not Applicable Name of Attact Information (Yes/No)	313(f)(2). I further certify that Yes - Attach Certific ned Document Listing Required - No Attachment Required ned Document Listing Required	t the information reported on this form and in
complian	the with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)  Millestone Certification (47 CFR § 54.313(f)(1)(i))  Please Provide Attachment  Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  If yes, does your company file the RUS annual report	Name of Attact Information Not Applicable Name of Attact Information (Yes/No)	313(f)(2). I further certify that Yes - Attach Certific ned Document Listing Required - No Attachment Required ned Document Listing Required	t the information reported on this form and
compliant the docur (3009) (3010A) (3010B) (3012A) (3012B) (3013)	the with the financial reporting requirements set fortinents attached below is accurate.  Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)  Milestone Certification (47 CFR § 54.313(f)(1)(i))  Please Provide Attachment  Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))  Please Provide Attachment  Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))  If yes, does your company file the RUS annual report  Please check these boxes to confirm that the	Name of Attact Information Not Applicable Name of Attact Information (Yes/No)	313(f)(2). I further certify that Yes - Attach Certific ned Document Listing Required - No Attachment Required ned Document Listing Required	t the information reported on this form and in

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Name of Attached Document Listing Required

Name of Attached Document Listing Required

Information

Information

(Yes/No)

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documentation

audited?

certification.

and Statement of Cash Flows

and Statement of Cash Flows

and Statement of Cash Flows

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(3017)

(3018)

(3019)

(3020)

(3021)

(3022)

(3023)

(3024)

(3025)

(3026)

Document(s) with Balance Sheet, Income Statement

If the response is yes on line 3014, attach your

company's RUS annual report and all required

If the response is no on line 3014, is your company

If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

Document(s) for Balance Sheet, income Statement

Management letter and/or audit opinion issued by

the independent certified public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:

Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers

Underlying information subjected to a review by an independent certified public accountant

Underlying information subjected to an officer

Document(s) for Balance Sheet, Income Statement

Attach the worksheet listing required information

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3005) Rate Of Return Corrier Additional Documentation (Continued)		
(3005) Rate Of Return Order Additional Decembertation (Continued)		

DAMB Control No. 3060-0985/DAMB Control No. 3060-0819

FCC Form 481

July 2013

Data Collection Form

| 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 462141 | 4

# Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service (TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

Mame of Attached Document Listing Required Information

(4005) Rural Broadband Experiment Additional Documentation  Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	
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<010>	Study Area Code	443841
<015>	Study Area Name	garta pora tre, corp
<020>	Program Year	261.1
<030>	Contact Name - Person USAC should contact regarding this data	James Tele
<035>	Contact Telephone Number - Number of person identified in data I	ine <030>
<039>	Contact Email Address - Email Address of person identified in data	line <030> 1 anni i relevant survens. But

#### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

#### Public Interest Obligations - FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the Identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

#### Community Anchor Institutions - FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

#### If yes to 4003A, please provide a response for 4003B.

speed and data usage allowances available in the

relevant geographic area.

A003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st Immediately preceding the July 1st filing deadline for the FCC Form 481.

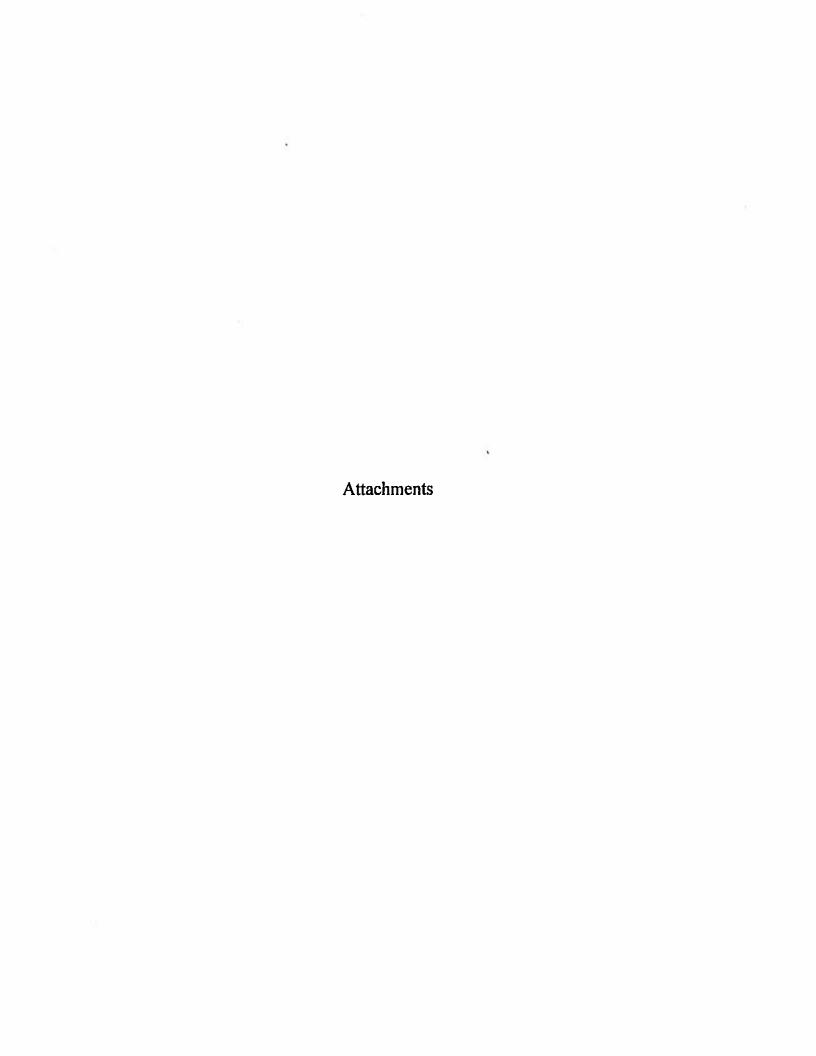
4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband Name of Attached Document Listing Required Information

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	442141
<015>	Study Area Name	SANTA ROSA TEL COOP
<020>	Program Year	2017
<030>	Contact Name - Person USAC should contact regarding this data	Jason Tole
<035>	Contact Telephone Number - Number of person identified in data line <030>	9408862217 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	daen.tole@srcaccess.net

#### TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate. Name of Reporting Carrier: SANTA ROSA TEL COOP Signature of Authorized Officer: CERTIFIED ONLINE Printed name of Authorized Officer: JASON TOLE Title or position of Authorized Officer: P408862217 ext.14 Study Area Code of Reporting Carrier: 442141 Filling Due Date for this form: 07/01/2016 Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. \$502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.



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<010>	<010> Study Area Code	442141
<015>	<015> Study Area Name	SANTA ROSA, TEL COOP
<020>	<020> Program Year	2017
<030>	<030> Contact Name - Person USAC should contact regarding this data	Company Tole
<035>	<035> Contact Telephone Number of person identified in data line <030> 9408662211 ext.	9408862217 ext.
<039>	<ul> <li>&lt;039&gt; Contact Email Address - Email Address of person identified in data line &lt;030&gt; 1ason. to lessing cancers. Between the contact of the conta</li></ul>	lason.tolessr.se.

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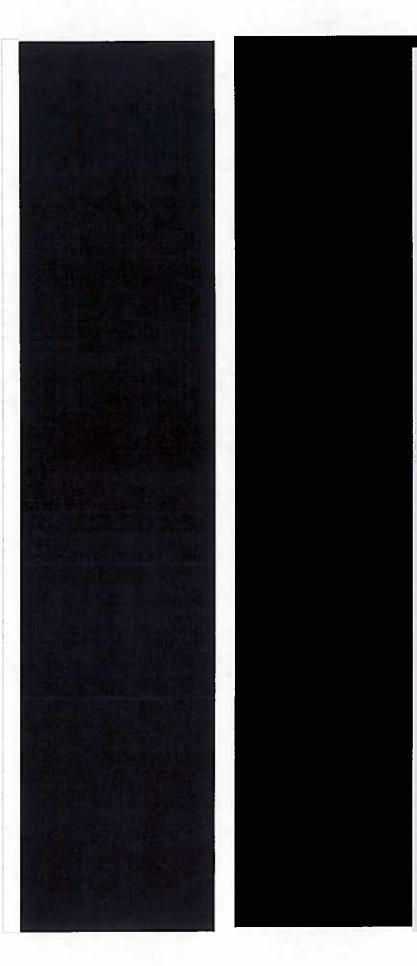
<a1>&gt;</a1>	<25>	<83>	<01>	<p><p>&lt;</p></p>	<b>-b3</b> >	< <del>604</del> >	< <del>6</del> 65	9
State	Exchange (11£C)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Change	Total per line Rates and Fee
TX.	CHARLIE		FR	16.15	0.0	0.59	1.85	18.59
ТX	GOODLETT		PR	14.5	0.0	0.59	3.E	16.59
χţ	LAKE KEMP		77.	14.5	0.0	0.59	3.5	18.59
XT	THALIA		PR	14.5	0.0	0.59	3.5	18.59
KI	CEEVEE		FR	18.0	0.0	0.59	0.0	18.59
ΤX	CROWELL		环	18.0	0.0	0.59	0.0	18.59
TX	KIRKLAND	_	FR	18.0	0.0	0.59	0.0	18.59
TX	MEDICINE MOUND		FR	19.0	0.0	0.59	0.0	18.59
TX	ODELL		FR	18.0	9.0	95°C	0.0	18.59
TX	OKLAUNION		74	18.0	0.0	£5.0		18.59
ТX	TRUSCOLT		FR	18.0	0.0	65 0	0 0	18 59
					ı.			

710) Broadband Price Offerings	FCC Form 481
Nata Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060
	July 2013

	Study Area Code			442141				
- 1	Study Area Name			SANTA ROSA TEL COOP	, COOP			
- 1	Vear			2017				
- 1	Contact Name - Person USAC should contact regarding this data	ld contact regarding	this data	Jason Tole				
- 1	Contact Telephone Number - Number of person identified in data line <030>	ber of person identii	fied in data line <0300	9408862217 ext				
<039> Contact	Contact Email Address - Email Address of person identified in data line <030>	ress of person identi	fied in data line <030	jason.tolefarcaccess net	access net			:
<711>	<92>	 	<	<db></db>	400	<ep>&gt;</ep>		<d4>&gt;</d4>
	-	- Internation	3	Total Bates	Broadband Service -	Broadband Service - Broadband Service	Usage Alfowance	Usage Allowance
State	Exchange (ILEC)	Rate	Fees	and Fees	Download Speed (Mbps)	ps	(68)	Action Taken When Limit Reached {select}
XT	ALL	27.95	0.0	27.95	3.0	1.0	0.666866	Other, NO LIMIT
Ħ	ALL	36.95	0.0	36.95	0 9	1.0	0.886888	Other, NO LDEIT
XI	ALL	50.95	0.0	50.95	12.0	2.0	0.66666	Other, NO LIMIT
ጀ	ALL	69.95	0.0	59.95	25.0	5.0	0 666666	Other, NO LIMIT
XT	ALL	89.95	0.0	89.95	20.05	10.0	0 666666	Other, NO LIMIT
TX	ALL	129.95	0.0	129.95	100.0	10.0	0 666666	Other, NO LIMIT
								:
_								

Rting Companies FCC Form 481	tion Form OMB Cantrol No. 3060-0986/OMB Cantrol No. 3060-0986/OMB Cantrol No. 3060-0819	MV 2013
 (800) Operating Companies	Data Collection Form	

									<##>	Doing Business As Company or Brand Designation																: I							
	SANTA ROSA TEL COOP		ole	217 ext.	jason.tolessrcaccess.net				<i>₹8</i>	SAC																							
442141	SANTA RC	2017	Jason Tole	9408862217 ext	jason. to																											5.5	
			Contact Name - Person USAC should contact regarding this data	Contact Telephone Number - Number of person identified in data line <030>	Contact Email Address - Email Address of person identified in data line <030>	Santa Rosa Telephone Cooperative, Inc.	Santa Rosa Telephone Cooperative, Inc.	Santa Rosa Telephone Cooperative, Inc.	( <del>P</del> )	Affillates	A COMMUNICATIONS, LTD.																						
Study Area Code	Study Area Name	Program Year	Contact Name - Person U	Contact Telephone Numl	Contact Email Address - I	<810> Reporting Carrier	<811> Holding Company	Operating Company			SANTA ROSA										!												
<010>	<015>			<035>	<039>	<810>	<811>	<812>	<813>	ľ	Ш	ı	ı 1	ı	1	ı	ı	ı	ı	1	i	!	ľ	1	'	1	•	1	ı	(	'		



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	<b>Estimated Capital</b>		
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	ES		
<b>Estimated</b>	<b>Population</b>	7	
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Tat	Per	Date	
<b>Estimated</b>	E	_	
	<b>Estimated Start</b> Completion		
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Area	Served/Wire	center	
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		<b>Project Description</b>	
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Voice Network Upgrades: 2017

	Estimated Capital Costs	
	Estimated Population E Served	
	Estimated Completion Date	
	Estimated Start Date	
	Area Served/Wire center	
Voice Network Upgrades: 2017	Project Description	

SANTA ROSA TELEPHONE COOPERATIVE, INC.

**Broadband Upgrades: 2017** 

Estimated Capital Costs	
Estimated Population Served	
Estimated Completion Date	
Estimated Start Date	
Area Served/Wire center	
Project Description	

SANTA ROSA TELEPHONE COOP., INC.
SERVICE QUALITY
REPORTING MAP
TEXAS 2016
CEE VEE CROWELL
GOODLETT, CHARLIE
KIRKLAND, LAKE KEMP,
MEDICINE MOUND,
ODELL, OKLAUNION,
THALIA, AND
TRUSCOTT
WIRECENTER
BOUNDARIES

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SANTA ROSA TELEPHONE - 442141	
СарЕх	二天在安日上 多天北南西 上日
2110 Land & General Support	
2210 Central Office Switching	
2230 Central Office Transmission	
2410 Cable & Wire Facilities	
Total Capital Expenditures	
OpEx	というのははは、これので
Plant Specific	
Plant Nonspecific	
Depreciation	
Customer Operations	
Corporate Operations	
Total Operating Expenses	
USF YTD (1/15 - 6/15)	
Total USF YTD	
USF BreakOut	
CapEx USF ObeEx USF	

REDACTED - FOR PUBLIC INSPECTION

Response Line 510 SANTA ROSA TELEPHONE COOPERATIVE, INC. Study Area 442141

#### Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) SANTA ROSA TELEPHONE COOPERATIVE, INC.("SRTC") is in compliance with appropriate FCC Service Quality Standards and Consumer Protection Rules. SRTC provides CPNI training to all of its new employees and in addition trains all of its existing employees on an annual basis. SRTC also conducts subscriber outreach regarding CPNI by placing CPNI explanation onto its website at www.santarosatelco.com which informs subscribers about CPNI rules and other applicable customer rights and obligations. In addition SRTC trains staff on Red Flag issues on an annual basis. All company employees are required to sign and acknowledge that they have completed CPNI and Red Flag training and understand obligations to adherence of applicable rules.

SRTC also outlines its rates, terms, and conditions under which SRTC offers service in its Local Exchange Tariff. The tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. SRTC keeps its tariffs available for public inspection at its business offices.

#### Broadband Network

Pursuant to 47 C.F.R. § 54.313(a)(5) and or 47 C.F.R. § 54.422(b)(3) CLEC is in compliance with applicable FCC Service Quality Standards and Consumer Protection Rules. SRTC trains staff on applicable rules for broadband services issues on an annual basis. In addition SRTC has placed on its website at www.santarosatelco.com its network practices and policies regarding FCC's Net Neutrality Rules.

SRTC also outlines its rates, terms, and conditions under which SRTC offers Broadband service in NECA Tariff #5 to Internet Service Providers ("ISP"). The Tariff explains customer rights and obligations, customer service, dispute resolution, deposits, billing and payment options, disconnection of service as well as cancellation of service options. Public inspection of NECA Tariff #5 can be found on NECA's website. Retail DSL rates, terms, and conditions for retail services are provided by the ISP.

Response Line 610 SANTA ROSA TELEPHONE COOPERATIVE, INC. Study Area 442141

#### **Functionality in Emergency Situations:**

#### Voice Network

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) SANTA ROSA TELEPHONE COOPERATIVE, INC. ("SRTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to SRTC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power. In addition, SRTC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. SRTC also has SONET, DWDM, and ATM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute traffic should a fiber cut occur. SRTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. SRTC also has proper staff in place to repair any fiber cuts in a timely manner. SRTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. SRTC has developed and trained its staff on network preparedness plans in case of emergency situations. SRTC is prepared and capable of managing traffic spikes resulting from emergency situations and has sufficient switching capabilities to handle such situations.

#### **Broadband Network**

Pursuant to 47 C.F.R. § 54.313(a)(6) and 47 C.F.R § 54.22(b)(4) as set forth in 47 C.F.R. § 54.202(a)(2) SANTA ROSA TELEPHONE COOPERATIVE, INC. ("SRTC") meets the requirements to remain functional in emergency situations and has the following capabilities: Back-up power is provided to SRTC central offices by use of a generator and batteries that provide it with 8 to 12 hours of emergency power that is also used to provide service to the broadband network. In addition, SRTC field electronics have 8 to 12 hours of back-up power by use of generators and batteries. SRTC also has SONET, DWDM, and ATM technology deployed in its core fiber optic network that is a self-healing and will automatically reroute broadband traffic should a fiber cut occur. SRTC has also sufficient spare cards for its fiber optic network to provide almost instantaneous replacement should there ever be a card failure in the core network. SRTC also has proper staff in place to repair any fiber cuts in a timely manner. SRTC has connectivity with neighboring telephone exchanges as well as the LATA tandem to provide diverse options to reroute traffic should an emergency arise. SRTC has developed and trained its staff on network preparedness plans in case of emergency situations.

Response to Line 1010 Santa Rosa Telephone Cooperative, Inc. Study Area 442141

#### Voice Services Comparability Report

Pursuant to 47 C.F.R. § 54.313 (a) (10) Santa Rosa Telephone Cooperative, Inc. ("SRTC") is in compliance with the requirement that voice services is no more than two standard deviations above the national average urban rate for voice service of \$41.07 as specified in Public Notice DA 16-362 issued on April 5, 2016. SRTC's current total local end-user rate¹ of \$18.59 (which includes a local fee of \$14.50-\$18.00 and surcharges and any EAS) is not above the standard deviation as specified in the USF/ICC Transformation Order. <sup>2</sup>

<sup>&</sup>lt;sup>1</sup> Local End User Rate as defined in USF/ICC Transformation Order 26 FCC Rcd at 17751, Para. 238
<sup>2</sup> USF/ICC Transformation Order, 26 FCC Rcd at 17694, Para. 84 (footnote included) "The standard deviation is a measure of dispersion. The sample standard deviation is the square root of the sample variance. The sample variance is calculated as the sum of the squared deviations of the individual observations in the sample of data from the sample average divided by the total number of observations in the sample minus one. In a normal distribution, about 68 percent of the observations lie within one standard deviation above and below the average and about 95 percent of the observations lie within two standard deviations above and below the average."

Response to Line 1030 Santa Rosa Telephone Cooperative, Inc. Study Area 442141

#### **Broadband Services Comparability Report**

Pursuant to 47 C.F.R. § 54.313 (a) (1) Santa Rosa Telephone Cooperative, Inc. ("SRTC") charges a residential rate of \$69.95 for broadband providing 10 Mbps download, 1 Mbps upload, and an unlimited usage allowance. This rate is lower than \$77.80, which is the 2015 reasonable comparability benchmark for the same offering established by the Wireline Competition Bureau.<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Announces Results of 2015 Urban Rate Survey for Fixed Voice and Broadband Services and Posting of Survey Data and Explanatory Notes, Public Notice, WC Docket No. 10-90, DA 15-470 (rel. April 16, 2015).

# Santa Rosa Telephone Cooperative, Inc. Terms and Conditions of Service

Vernon Office	Seymour Office	Haskell Office
1-888-886-2217	1-877-889-1125	1-888-863-1125
M-F 8:30-5:00	M-F 8:00-5:00	M-F 8:00-5:00

#### Customer Rights Information

You have been provided with a telephone directory that includes Customer Rights information and other important telephone information. Every six months you will receive a bill insert directing you to that information.

#### □ Lifeline and Tel-Assistance Services

Special reduced rates are available to some customers that qualify based on limited income and or disability. Please call our office for more information.

#### Descriptions of Services and Charges

Descriptions of the service to which you have subscribed will be presented to you. You have also been provided with a list of the monthly charges for each service to which you have subscribed, and have been informed of the lowest-priced alternative plans available.

The installation fees are one-time non-recurring charges that are not refundable. You will not be required to pay a deposit if a letter of credit from your previous company is provided; or if you are an applicant who is sixty-five (65) years of age or older. If a deposit is required it will be returned with interest after 12 months of paying your telephone bill on time for residential service and 24 months for business service. Any construction charges applicable to your service have been explained to you.

Your membership entitles you to accrue capital credits with the Cooperative, but the Cooperative must make a profit before capital credits are allocated.

#### Other Charges

Your first bill may also include a prorated amount for the first month of service. Surcharges and taxes on your bill are also assessed each month as a percent of revenue and remitted to the appropriate agency or authority. The Cooperative will charge \$25 for each returned check. If service is disconnected for non-payment a minimum service restoration charge will apply to have service restored.

#### Billing Cycle

Charges for local service are billed one month in advance. Long distance charges are usually billed one-half to one and one-half months after calls have been made. Your bill is mailed by the 1st of every month, and is due upon arrival. Your payment is considered past due if not paid by the 16th day after issuance.

#### Canceliation Policy

If service is canceled after the service is installed you will be responsible for the non-recurring installation charges, which will not be refunded.

#### Contracts and Right of Cancellation

If your service requires a term contract, the minimum contract service terms have been provided to you. Also, if the term of the contract is longer than 31 days, you have six business days from the time the terms and conditions information is sent to you to cancel the contract without penalty or fee.

#### Anti-Discrimination Policy

Cooperative services are provided without discrimination as to a customer's race, color, sex, nationality, religion, marital status, income level, source of income, or from unreasonable discrimination on the basis of geographic location.

This information is available in Spanish. Esta informacion es disponible Espanol.

# Santa Rosa Communications, L.T.D. Terms and Conditions of Service

#### **Descriptions of Services and Charges**

Descriptions and a list of the monthly charges for service to which you have subscribed are furnished for your information. The installation fees are one-time non-recurring charges that are not refundable. If a deposit is required it will be returned with interest after 12 months of paying your telephone bill on time for residential service and 24 months for business service.

#### Other Charges

Your first bill may also include a prorated amount for the first month of service. Surcharges and taxes on your bill are also assessed each month as a percent of revenue and remitted to the appropriate agency or authority. If service is disconnected for non-payment a minimum service restoration charge will apply to have service restored.

#### SRC Long Distance

#### Service Plans

#### Residential

Flat Rate: \$0.10 / minute
One Rate: \$4.95 plus \$0.07 / minute

Volume Discount Rates:
Varies \$0.07 to \$0.11 / min
48 States: \$30.00 / month
Includes 48 contiguous states

Residential
Peak/Off Peak Plan:
Peak: \$0.11/min
7 a.m. – 6:59 p.m.

M - F Off Peak: \$0.09/min All other times

### Business Peak/Off Peak Plan:

Peak: \$0.13/min 7 a.m. — 6:59 p.m. M - F

Off Peak: \$0.11/min All other times

#### Business

Flat Rate: \$0.12 / minute

One Rate: \$4.95 plus \$0.09 / minute

Volume Discount Rates: Varies \$0.07 to \$0.13 / min

#### D PIC Freeze

A Preferred Carrier Freeze is available to sign, so Santa Rosa Telephone Coop, Inc. will not change the carrier providing service without your direct authorization by verbal or written request.

#### Toll Free Numbers

Toll Free Numbers are available to you without a monthly service fee, but \$0.15 per minute will be charged to the customers' bill when toll free numbers are used.

Response to Line3010 Santa Rosa Telephone Cooperative, Inc. Study Area 442141

#### **Milestone Certification**

Pursuant to 47 C.F.R. § 54.202(a) Santa Rosa Telephone Cooperative, Inc. ("SRTC") provides this certification that it is taking reasonable steps to provide upon reasonable request broadband speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to offerings in urban areas as determined in an annual survey as specified in Public Notice DA 16-362, and that requests for such service are met within a reasonable amount of time. Details for how SRTC is meeting its obligations for its goals and required obligations are specified within the FCC Form 481 annual filing.

According to the Paperwark Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0572-0031. The time required to complete this information collection is estimated to average 4 hours per response, including the time for reviewing instructions, seembling and experience and person and personal persona

scarching existing data sources, gathering and maintaining					
USDA-RU	IS		This data will be used by RUS to review your financial situation. Yo		
			and, subject to federal laws and regulations regarding confidential	information, will be treated a	s confidential.
			BORROWER NAME		
OPERATING REF			Santa Rosa Telephone Cooperative,	Inc.	
TELECOMMUNICATION	15 BORROWER	RS			
			DETION ENDING	honoure access	1011
INSTRUCTIONS-Submit report to RUS within 30 da For detailed instructions, see RUS Bulletin 1744-2.			PERIOD ENDING December, 2015	BORROWER DESIGNATI	IDM
r or petanea interactions, see NOS bunena 1744-2.	neport in whole uoliu	<del></del>	<del></del>	170333	
We hereby certify that the entries in this	report are in accor		ERTIFICATION counts and other records of the system and reflect the sta	tus of the system	
to the best of our knowledge and belief.	report are in accor	manice from the de-	and area of the reading of the system with region the sin	and by sine by brein	
-			II, RUS, WAS IN FORCE DURING THE REPORTE	NG PERIOD AND	
RENEWALS HAVE BEEN OBTAIN	ED FOR ALL PO	LICIES.			
DURING THE PERIO	OD COVERED BY		PURSUANT TO PART 1788 OF 7CFR CHAPTER	KVII	
		(Check on	e of the following)		
All of the obligations under the RUS loan do have been fulfilled in all material respects.	cuments		There has been a default in the fulfillment of the obig under the RUS loan documents. Sold default(s) later		
nave bean indilied in all malerial lespects.			specifically described in the Telecom Operating Repr		
Kirk Petty		3/22/2016			
		DATE	<del></del>		
		PART	A. BALANCE SHEET		
	BALANCE	BALANCE	The principal of the pr	BALANCE	BALANCE
ASSETS	PRIOR YEAR	END OF PERIOD	LIABILITIES AND STOCKHOLDERS' EQUITY	PRIOR YEAR	END OF PERIOD
CURRENT ASSETS	A CONTRACTOR OF THE PARTY	Ferce Seedlest winds	CURRENT LIABILITIES	174317474747474	15 TO SET DE SETE
			25. Accounts Payable	4.11.12.11.11	1.7-1.7-1-1-1
1. Cash and Equivalents	+		26. Notes Payable	_	
2. Cash-RUS Construction Fund	214			- 10	
3. Affiliates:	High I		27. Advance Bitlings and Payments	_	
a, Telecom, Accounts Receivable	-	1 (2)	28. Customer Deposits	-	
b, Other Accounts Receivable	-77		29, Current Mat, L/T Debt 30, Current Mat, L/T Debt-Rur, Dev,	_	
c. Notes Receivable	1	100		_	
4, Non-Affillates:	1	v 3	31, Current MatCapital Leases		
a. Telecom, Accounts Receivable	-	- 2	32. Income Taxes Accrued	_	
b. Other Accounts Receivable	+	11/0	33. Other Taxes Accrued	_	
c. Notes Receivable	+		34. Other Current Liabilities		
5, Interest and Dividends Receivable	+	3,	35. Total Current Liabilities (25 thru 34) LONG-TERM DEST		
6. Material-Regulated	-	10.			
7. Material-Nonregulated		43	38. Funded Debt-RUS Notes	- 63	
8, Prepayments	H	1	37. Funded Debt-RTB Notes	_	
9. Other Current Assets	-	170	38. Funded Debt-FFB Notes	_	
10, Total Current Assets (1 Thru 9)	-	- 31	39. Funded Debt-Other  40. Funded Debt-Rural Develop. Loan	_	
NONCURRENT ASSETS	1			_	
11. Investment in Affiliated Companies	-		41. Premium (Discount) on L/T Debl	_	
a, Rural Development			42. Reacquired Debt		
b. Nonrural Development	4	20 75	43. Obligations Under Capital Lease	_	ļ
12. Other Investments	15		44. Adv. From Affiliated Companies	-	
a. Rural Development			45. Other Long-Term Debt	<del></del>	
b. Nonural Development			46. Total Long-Term Debt (38 thru 45)		
13. Nonregulated trivestments	-	- 17	OTHER LIAB, & DEF, CREDITS		
14, Other Noncurrent Assets	- 3		47. Other Long-Term Liabilities		
15. Deferred Charges		0.	48. Other Deferred Credits	-	
16. Jurisdictional Differences	H	23	49. Other Jurisdictional Differences	_	
17. Total Noncurrent Assets (11 thru 16)	4)		50. Total Other Liabilities and Deferred Cradits (47 thru 48)	_	
PLANT, PROPERTY, AND EQUIPMENT		- 1	EQUITY		
18. Telecom, Plant-in-Service		1.0	51, Cap. Stock Outstand. & Subscribed	_	1
19. Property Held for Future Use		1	52. Additional Paid-in-Capital		
20. Plant Under Construction			53. Treasury Stock		
21. Plant Adj., Nonop. Plant & Goodwill		-	54, Membership and Cap. Certificates		-
22. Less Accumulated Depreciation	_		55, Other Capital		
23. Net Plant (18 thru 21 less 22)	_		56. Patronage Capital Credits		
24. TOTAL ASSETS (10+17+23)		77.	57. Retained Earnings or Margins		8
		0.00	58. Total Equity (51 thru 57)	3	
			59. TOTAL LIABILITIES AND EQUITY (35+46+50+58)	28.5	

#### USDA-RUS

# OPERATING REPORT FOR TELECOMMUNICATIONS BORROWERS

	DESIGNATION
OURKUYVER	UCORNALIUN

TX0559

PERIOD ENDING

INSTRUCTIONS- See RUS Bulletin 1744-2

December, 2015

#### PART B. STATEMENTS OF INCOME AND RETAINED EARNINGS OR MARGINS

19. Other Operating Income and Expenses     17. State and Local Taxes     18. Federal Income Taxes     19. Other Taxes     1	PART B. STATEMENTS OF INCOME AND RETAINED E	ARNINGS OR MARGINS	
2. Network Access Services Revenues 3. Long Distance Nativork's Services Revenues 4. Carriar Billing and Collection Revenues 5. Miscellaneous Revenues 6. Lincollectible Revenues 7. Net Operating Revenues († that 5 less 5) 8. Plant Napsedific Operations Expanse 9. Plant Nanspedific Operations Expanse (Excluding Depreciation & Amortization) 10. Depreciation Expanse 11. Amortization Expanse 12. Customer Operations Expanse 13. Corporate Operations Expanse 14. Total Operating Expanses 15. Operating Operations Expanse 16. Operating Departing Expanses 17. State and Local Taxos 18. Departing Income and Expanses 19. Other Taxos (17+18-18) 19. Other Taxos (17+18-19) 10. Other Taxos (17+18-19) 11. National Operating Taxos (17+18-19) 12. Interest Expanse 19. Other Taxos (17+18-19) 13. Interest Expanse 19. Other Taxos (19+18-19) 14. Taxos (19+18-19) 15. Operating National Operational O	ITEM	PRIOR YEAR	THIS YEAR
3. Long Distance Network Sarvices Revenues 4. Carlier Billing and Collection Revenues 5. Macellanous Revenues 6. Uncollectible Revenues 7. Net Operating Revenues (I thru 5 less 6) 8. Plant Specific Operations Expense 9. Plant Nonspecific Operations Expense 9. Coutemer Operations Expense 10. Coutemer Operations Expense 11. Amortization Expense 12. Coutemer Operations Expense 13. Corporate Operations Expense 14. Total Operating Expenses (8 thru 13) 15. Operating Income or Margins (7 less 14) 16. Other Operating Income and Expenses 17. State and Local Taxes 18. Federal Income Taxes 19. Total Operating Income or Margins (1616-20) 19. Total Operating Income or Margins (1616-20) 19. Interest Expense 19. Total Operating Taxes (1716-18-20) 19. Interest Expense 19. Jurisdiction Income Operations Expense 19. Jurisdiction Operations Expense 19. Jurisdictional Offerences 19. Allowance for Funds Used During Construction 19. Total Red Parties of Punds Used Punds (1616-20) 19. Nonogulated National Punds (1616-20) 19. Operating Punds (1616-20) 19. Dividends Declared (Common) 19. Dividends Declared (Common	Local Network Services Revenues	L. L. CARROLLE III	
4. Carrier Billing and Collection Revenues 5. Miscellaneous Revenues 6. Uncollectible Revenues 7. Not Operating Revenues (1 thru's liese 6) 8. Plant Specific Operations Expense 9. Plant Nonspecific Operations Expense 10. Depreciation Expense 11. Amortization Expense 12. Customer Operations Expense 13. Corporate Operations Expense 14. Total Operating Expenses 15. Corporate Operations Expenses 16. Customer Operations Expenses 17. Soprating Income or Marginer (1 test 4) 18. Other Operating Expenses (8 thru 13) 19. Operating Income or Marginer (1 test 4) 19. Other Operating Income and Expenses 19. Other Operating Income and Expenses 19. Other Taxes 10. Total Operating Income or Marginer (16-16-20) 21. Indexest on Funded Debt 23. Interest Expense - Capital Lasses 14. Other Interest Expense 15. Allowance for Funds Used Ouring Construction 16. Total Fixed Charges (22-23-24-25) 17. Nonoparating Nal Income 18. Extraordinary Items 19. Universe Charges (22-23-24-25) 19. Total Taxes Based on Income 19. Total Taxes Based on Income 10. Total Taxes Based on Income 10. Rotal Income Order (16-16-16-16-16-16-16-16-16-16-16-16-16-1	2. Network Access Services Revenues		
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18. Federal Income Taxes   19. Other Taxes   19. Other Taxes   19. Other Taxes   19. Other Taxes   17.18+19    19. Other Interest Expense - Capital Leases   19. Other Interest Expense			
19. Other Taxes   17. Intel Operating Taxes (17+18+19)     17. Not Operating Income or Margins (15+16-20)     18. Interest on Funded Debt     18. Interest Expense - Capital Leases     18. Other Interest Expense - Capital Leases     18. Other Interest Expense - Capital Leases     18. Other Interest Expense - Capital Leases     19. Other Interest Expense - Capital			
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Patronage Capital Beginning-of-Year  Transfers to Patronage Capital Retired Patronage Capital End-of-Year (40+41-42) Annual Debt Service Payments Cash Ratio [(14+20-10-11) / 7] Operating Accrual Ratio [(14+20+26) / 7] TIER [(31+26) / 26]			
D. Patronage Capital Beginning-of-Year  1. Transfers to Patronage Capital 2. Patronage Capital Credits Retired 3. Patronage Capital End-of-Year (40+41-42) 3. Annual Debt Service Payments 5. Cash Ratio [(14+20-10-11) / 7] 6. Operating Accrual Ratio [(14+20+26) / 7] 7. TIER [(31+26) / 26]	8. Transfers to Patronage Capital		
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3. Annual Debt Service Payments 5. Cash Ratio [(14+20-10-11) / 7] 6. Operating Accrual Ratio [(14+20+26) / 7] 7. TIER [(31+26) / 26]	2. Patronage Capital Credits Retired	<u> </u>	88
5. Cash Ratio [(14+20-10-11) / 7] 6. Operating Accrual Ratio [(14+20+26) / 7] 7. TIER [(31+26) / 26]	3. Patronage Capital End-of-Year (40+41-42)		
3. Operating Accrual Ratio [(14+20+26) / 7] 7. TIER [(31+26) / 26]	4. Annual Debt Service Payments		
3. Operating Accrual Ratio [(14+20+26) / 7] 7. TIER [(31+26) / 26]	5. Cash Ratio [(14+20-10-11) / 7]		
7. TIER [(31+26) / 26]	6. Operating Accrual Ratio ((14+20+26) / 7]		
	7. TIER [(31+26) / 26]	100	
	8. DSCR [(31+26+10+11) / 44]		

#### **BORROWER DESIGNATION** USDA-RUS TX0559 OPERATING REPORT FOR PERIOD ENDED **TELECOMMUNICATIONS BORROWERS** December, 2015 INSTRUCTIONS - See help in the online application. PART I - STATEMENT OF CASH FLOWS Beginning Cash (Cash and Equivalents plus RUS Construction Fund) **CASH FLOWS FROM OPERATING ACTIVITIES** 2. **Net Income** Adjustments to Reconcile Net Income to Net Cash Provided by Operating Activities 3. Add: Depreciation 4. Add: Amortization 5. Other (Explain) Changes in Operating Assets and Liabilities Decrease/(Increase) in Accounts Receivable Decrease/(Increase) in Materials and Inventory 7. Decrease/(Increase) in Prepayments and Deferred Charges 8. Decrease/(Increase) in Other Current Assets 9. Increase/(Decrease) in Accounts Payable 10. Increase/(Decrease) in Advance Billings & Payments 11. increase/(Decrease) in Other Current Liabilities 12, 13. Net Cash Provided/(Used) by Operations **CASH FLOWS FROM FINANCING ACTIVITIES** 14. Decrease/(Increase) in Notes Receivable Increase/(Decrease) in Notes Payable 15. 16. Increase/(Decrease) in Customer Deposits Net Increase/(Decrease) in Long Term Debt (Including Current Maturities) 17. Increase/(Decrease) in Other Liabilities & Deferred Credits 18. Increase/(Decrease) in Capital Stock, Paid-in Capital, Membership and Capital Certificates & Other Capital 19. Less: Payment of Dividends 20. Less: Patronage Capital Credits Retired 21. 22. Other (Explain) Net Cash Provided/(Used) by Financing Activities 23. CASH FLOWS FROM INVESTING ACTIVITIES Net Capital Expenditures (Property, Plant & Equipment) 24. 25. Other Long-Term Investments Other Noncurrent Assets & Jurisdictional Differences 26 27. Other (Explain)

28.

29.

30.

Net Cash Provided/(Used) by Investing Activities

Net Increase/(Decrease) in Cash

**Ending Cash**